

## **Department of Energy**

Richland Operations Office P.O. Box 550 Richland, Washington 99352

00-RU-0365

Mr. M. J. Bullock, Vice President BNFL Inc. 3000 George Washington Way Richland, Washington 99352

Dear Mr. Bullock:

REGULATORY UNIT (RU) ACTION ON AUTHORIZATION BASIS AMENDMENT REQUEST, ABAR-W375-00-00006, REV. 1

References: (1) Letter CCN 012657 to D. C. Gibbs, RL, from A. J. Dobson, "BNFL Inc. Submittal of ABAR-2-375-00-00006, Revision 1, Authorization Basis

Maintenance – Proceed-at-Risk," dated April 21, 2000.

(2) Letter 00-RU-0285, to M. J. Bullock, BNFL, from D. C. Gibbs, "Regulatory Unit Position on Contractor-Initiated Changes to the Authorization Basis," Rev. 6, dated April 12, 2000.

The RU has completed its evaluation of your Authorization Basis Amendment Request ABAR-W375-00-00006, Rev. 1, and supporting documentation transmitted by Reference 1. The amendment revises Integrated Safety Management Plan (ISMP) Section 3.3.3, which is incorporated by reference in Section 9.0-4 of the Safety Requirements Document (SRD).

ISMP Section 3.3.3 describes BNFL's process for making changes to the TWRS-P authorization basis. The amended Section 3.3.3 of the ISMP incorporates a new authorization basis deviation process (formerly referred to as the "proceed at risk" process) and revisions to conform to changes made in Revision 6 to RL/REG-97-13 (Reference 2).

An editorial error was noted in the changes to ISMP Section 3.3.3.2 in ABAR-W375-00-00006. A detailed description of the error and corrected version of the text has been incorporated in Section 3.3 of the enclosed evaluation. This error was previously discussed with your staff. On the basis of the evaluation described in the enclosed safety evaluation report, the RU approves the changes to the ISMP described in ABAR-W375-00-00006, Revision 1, on the condition that the editorial error is corrected when incorporating the proposed changes in the ISMP.

The amendment is effective immediately. As part of the amendment implementation process, please submit within 14 days of receipt of this letter the revised pages of the ISMP and an ISMP revision page identifying all ISMP revisions to date.

Nothing in this letter should be construed as changing the Contract (DE-AC27-96RL13308). If your have any questions regarding this letter, the safety evaluation report, or the condition placed the approval of ABAR-W375-00-00006, please contact me or George Kalman of my staff on (509) 372-0652.

Sincerely,

D. Clark Gibbs, Regulatory Official Office of Safety Regulation of the TWRS-P Contractor

REG:RLS

Enclosures: Safety Evaluation of ABAR

cc w/encl:

D. A. Klein, BNFL